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## IN THE UNITED STATES DISTRICT COURT DISTRICT OF MARYLAND – BALTIMORE DIVISION

ALBERT SNYDER,

Plaintiff,

vs. Case No. :06-cv-1389-RDB

ENTERED RECEIVED

FRED W. PHELPS, SR.; SHIRLEY L. PHELPS-ROPER; REBEKAH A. PHELPS-DAVIS; and, WESTBORO BAPTIST CHURCH, INC., Defendants.

SP042007

CLERK U.S. DISTRICT OFURT DISTRICT OF MARYUAND

# PROPOSED QUESTIONS FOR JURY QUESTIONAIRE SUBMITTED BY DEFENDANTS PHELPS-DAVIS & PHELPS-ROPER

Pursuant to the Court's scheduling order, pro se defendants Phelps-Davis and Phelps-Roper submit the attached proposed questions for a jury questionnaire, and request that the Court include these questions in a questionnaire to the jury to be answered prior to voir dire.

Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

We hereby certify that the foregoing filing was served on August 31, 2007, as follows:

Original + 2 copies, with 2-hole punch, by express mail, in sealed envelope, with notice of filing of sealed document, with return envelope, to:

U S District Court Clerk 101 W. Lombard Street, 4<sup>th</sup> Floor Baltimore, MD 21201

Copy by regular mail to:

Mr. Sean E. Summers, Esq. Mr. Paul W. Minnich, Esq. Mr. Rees Griffiths, Esq. Barley Snyder LLC 100 E Market St PO Box 15012 York, PA 17401

Mr. Craig T. Trebilcock, Esq. Shumaker Williams PC 135 N George St Ste 201 York PA 17401

Mr. Jonathan L. Katz, Esq. 1400 Spring St., Suite 410 Silver Spring, MD 20910

Rebekah A. Phelps-Davis, Defendant Pro Se

Shirley L. Phelps-Roper, Defendant Pro Se

## Snyder v. Westboro Baptist Church, Inc., et al. Case No. 06-CV-1389

#### JURY QUESTIONNAIRE

- 1 Do you believe unpopular speech is covered or protected by the First Amendment?
- 2. Do you believe that speech you consider "hate speech" is protected under the First Amendment?
- 3 Do you believe people have the right to engage in speech that you consider offensive?
- 4. Do you have views that you believe are not main stream?
- 5. Do you believe speech that makes you very uncomfortable should be permitted?
- 6. Have you ever protested the government, any branch, at any level? Why and when?
- 7. Have you ever engaged in a protest, demonstration or picket? When, where and about what?
- 8. Have you ever engaged in First Amendment speech or religious activity that was controversial? What and when?
- 9. Do you believe people have the right to engage in religious practices which are unpopular?
- 10. Do you practice a faith that is not main stream?
  - . What is your opinion about whether God hates humans?
- 12. What is your opinion about whether God punishes people or nations for sin?
- 3. What is your opinion about whether tragedies or catastrophes (such as 911, the collapsed bridge in Minnesota, hurricanes, floods, etc.) are caused by God?

- 14. Do you believe adultery is a sin?
- 15. How do you define adultery?
- 16. Have you ever committed adultery as you define it?
- 7. Do you believe churches should preach against sin?
- 18. Do you believe America is being punished for the sins of Americans?
- 19. Do you believe parents should teach their children to obey the Bible?
- 20. Do you believe in the Bible?
- 21. Do you take the Bible literally?
- 22. What is your opinion of people who take the Bible literally?
- 23. How would you rate your knowledge of the content of the Bible?
- 24. Do you believe people have the right to teach their children what they believe about the Bible and how to live according to the commandments of the Bible?
- 25. Do you believe that divorce is a sin?
- 26. Do you believe that divorce is allowed in the Bible under any circumstances? When?
- 27. Have you ever been divorced?
- 28. What is your marital status?
- 29. Do you have any family member(s) who has/have been divorced?
- 30. Do you believe divorce is the equivalent of adultery?
- 31. Are you or have you ever been a member of the Roman Catholic Church?
- 32. What experience if any do you have with the Roman Catholic Church?

- 33. What knowledge do you have about the doctrines or practices of the Roman Catholic Church?
- 34. Have you seen media reports about priests of the Roman Catholic Church allegedly molesting young boys or girls? What is your opinion about this issue?
- 35. Do you believe that people have the right to criticize the Roman Catholic Church?
- 36. Do you believe idolatry is a sin?
- 37. What is your definition of "idolatry?"
- 38. What are your views about the war in Iraq?
- 39. What are your views about the American troops in Iraq?
- 40. What are your views about the war in Afghanistan?
- 41. What are your views about the American troops in Afghanistan?
- 42. Do you believe people should be allowed to protest about the war, for or against?
- 43. Are you a member of the military?
- 44. Are you a member of the National Guard?
- 45. Have you been a member of the military in the past?
- 46. Have you been a member of the National Guard in the past?
- 47. Are you a veteran?
- 48. Do you have a member of your family or friend who is currently in the military?
- 49. Do you have a family member or friend who was in the past an active member of the military?

- 50. Do you have a family member or friend who is a veteran of war?
- 51. Do you have a family member or friend who is currently in the National Guard?
- 52. Do you have a family member or friend who was in the past an active member of the **National Guard?**
- 53. Do you believe people who die in a war are heroes, no matter how they lived?
- 54. Have you ever participated in a demonstration or protest about the war?
- 55. Have you attended the funeral of any soldier or veteran? When?
- 56. Have you specifically attended the funeral of a soldier who died in Afghanistan or Iraq? When?
- 57. Have you ever participated in a demonstration or protest about "gay rights?"
- 58. Have you expressed a public opinion about "gay rights?"

### 59. Are you gay?

- 60. Do you have any family members or friends who are gay?
- 61. Do you believe the government should provide special protection or rights to homosexuals?
- 62. Do you believe homosexuality is a sin?
- 63. Do you believe churches should preach or teach against homosexuality?
- 64.Do you believe people have the right to publicly condemn or disagree with homosexuality?
- 65. What is your opinion about psychologists and psychiatrists?

- 66. Do you understand the difference between the education and training of a psychiatrist and a psychologist?
- 67. Do you believe that people can disagree with the psychiatric profession on religious grounds?
- 68. Have you ever heard of Westboro Baptist Church in Topeka, Kansas? What is your view of that church?
- 69. Have you ever heard of Fred Phelps, a pastor in Topeka, Kansas? What is your view of Pastor Phelps?
- 70. Have you heard of the picketers who protest outside of soldiers' funerals? What is your view of those picketers?
- 71. Have you heard of Richard Bennett, either as a political candidate or judge? What is your view of Richard Bennett?
- 72. Have you heard of Albert Snyder? What is your view of Albert Snyder?
- 73. Have you heard of an organization called the Patriot Guard? What is your view of the Patriot Guard?
- 74. Have you been involved in any legal proceeding as a party? If so, what kind of case, what was your status, and what was the outcome?
- 75. Have you been involved in any legal proceeding as a witness? What kind of case and what was your role?